

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America)

v.)

Kevin Ackeil COOPER) Case No.

Valdosta, GA)

US)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 01, 2018 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

a citizen of the Trinidad And Tobago, did unlawfully transport five undocumented alien (s) within the Southern District of Texas knowing or in reckless disregard of the fact that said alien(s) had come to, entered, or remained in the United States in violation of law, and transported or moved said alien(s) within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law;

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet._____
/S/ Omar Rios-Jr*Complainant's signature*

Omar Rios-Jr, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: April 03, 2018_____
*Judge's signature*City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

In support of Criminal Complaint

**UNITED STATES OF AMERICA
V.**

CRIMINAL COMPLAINT

Kevin Ackeil COOPER

Case Number:

On April 1, 2018, A U.S. Border Patrol Agent (BPA) was working assigned duties, in the primary lane, at the Laredo West Border Patrol Checkpoint located on Highway 83, north of Laredo, Texas. At approximately 0115 hours, a red Volvo Semi truck bearing Illinois license, approached the BPA's position. The BPA asked the driver, later identified as COOPER, Kevin Ackeil, as to his citizenship, and he stated that he was a U.S. citizen. The BPA asked where his destination was, he stated "California". The BPA also recognized that COOPER's GPS was taking him to Highway 44, on a route that was not normal for someone that was driving to California. At that moment, a canine agent was performing a free air sniff and informed the BPA that his Service Canine had alerted to the presence of narcotics and/or concealed humans in the trailer. The BPA immediately instructed the driver to park in the secondary lane for further inspection.

At secondary inspection the BPA ordered the driver to step out for further questioning. After a pat down search the canine agent asked COOPER for his Bill of Lading, COOPER said "I must have forgot it at the hotel." The BPA inspected the rear of the trailer and noticed that there was only a weak seal and no lock. At that moment the BPA heard a quiet "shuffling" noise coming from inside the trailer.

Upon cutting the seal and opening the trailer doors, it was discovered that there were five illegal aliens concealed in the otherwise empty trailer. The five individuals were found sitting on bare floor with no seatbelts, in complete darkness, with no water, no food, no cell phones, and inadequate ventilation. There were no means of egress, the trailer doors were only operable from the outside of the trailer.

While searching COOPER's personal items it was revealed that he was from Trinidad and Tobago and a permanent resident since 02/02/2010. COOPER stated on primary that he was in fact a U.S. Citizen.

COOPER was read his Miranda Rights by a Supervisory Border Patrol Agent (SBPA) and witnessed by the BPA. COOPER stated he understood and was aware of his rights as they were read to him in the English language. He acknowledged and signed them.

At the station, COOPER was again read his rights and stated that he understood them. COOPER acknowledged his rights and signed the form. COOPER stated "No, I'd rather not say anything" and invoked his right to have a lawyer present. At that time, all questioning of COOPER stopped.

On April 1, 2018, RAMIREZ-Guzman, Jose Antonio was interviewed by a SBPA, as to him being smuggled into the United States. RAMIREZ-Guzman stated he was a citizen of Mexico who had illegally waded the Rio Grande River on March 24, 2018. RAMIREZ-Guzman stated that an unknown guide assisted him through the brush for two hours until loading into a silver truck on an unknown highway. From there, he was taken to a house where he remained for several days. On April 1, 2018, during the early morning hours, he was transported by an unknown man to a place where he observed numerous semi-trailers. He along with four other subjects were told to get into the red and white tractor-semi trailer by the same man. The unknown man explained to them that they would be transported to San Antonio, Texas. RAMIREZ-Guzman added that approximately ten minutes later, the doors were shut by someone who he was unable to see. RAMIREZ-Guzman added that all he could recall is someone talking to the man who had initially dropped them off. He remembers that the other voice was very loud, distinctive and with a different American accent. RAMIREZ-Guzman stated that moments later, he heard the door of the tractor-trailer close and they began to move. (NOTE: At approximately, 1:15 a.m., the doors were opened by Laredo West Border Patrol Agents at the Immigration Checkpoint located on U.S. Highway 83.)

On April 1, 2018, RAMIREZ-Simon Raul was interviewed by a SBPA, as to him being smuggled into the United States. RAMIREZ-Simon stated he was a citizen of Mexico who had illegally waded the Rio Grande River on March 24, 2018.

RAMIREZ-Simon stated that an unknown guide assisted him through the brush for about an hour until getting into a silver truck on an unknown highway. From there, he was taken to a house where he remained for several days. On April 1, 2018, during the early morning hours, he was transported by an unknown man to a place where he observed numerous semi-trailers. He along with four other subjects were told to get into the red and white tractor-semi trailer by the same man. The unknown man explained to them that they would be transported to San Antonio, Texas. RAMIREZ-Simon added that approximately five minutes later, the doors were shut by someone who he was unable to see. (NOTE: At approximately, 1:15 a.m., the doors were opened by Laredo West Border Patrol Agents at the Immigration Checkpoint located on U.S. Highway 83.)

SUBSCRIBED and SWORN to before me this _____ day of _____.

Signature of Judicial Officer

Signature of Complaint